

IN LAFAYETTE, LA.

AUG 09 2006

United States District Court

nan
 ROBERT H. SHERWELL, CLERK
 WESTERN DISTRICT OF LOUISIANA

Western District of Louisiana

Bamon A. Paniagua,

:

Plaintiff,

:

Complaint

-Against-

:

Jury Trial Demanded

Daniel Stanford,

:

Defendant,

:

6:06CV1347 **LO**
JUDGE DOHERTY
MAGISTRATE JUDGE HILL

SEC.P

I. Parties:

Plaintiff, Damon A. Paniagua, resides at Federal
 Correctional Institution Reg. No. 15073-014 P.O. Box 38, Fort Dix,
 NJ 08640.

Defendant Daniel Stanford address is 117 Caillouet
 Place, Lafayette, LA 70501.

II. The Jurisdiction of the Court is invoked pursuant to 28
U.S.C. §1331.

III. Statement of Claim.

The counsel of record whos was retained counsel hired
 by the Plaintiff to effectively represent the Plaintiff in the
 year 2003-2006. Did violate and breach his sworn oath of office
 to uphold and defend the Constitution of the United States of
 America [1787], and the undersigned guaranteed right to effective
 assistance of counsel at all critical stages of the Plaintiffs
 representation.

Retained counsel Daniel Stanford lied to the Plaintiff. Advised that if I signed the plea agreement, at sentencing I would get 7 to 9 years. At sentencing the Plaintiff recieved 19 years. This type of inducement offered by defence counsel Daniel Stanford violated and gravely harmed the Plaintiff.

Retained counsel Stanford failed to discuss and show the Plaintiff the PSI in this case or anyother case documents.

Daniel Stanford did not and failed to come see the Plaintiff at the regional jail for the whole 9 months the Plaintiff was there. The Plaintiff could not express the concerns and views needed to be discussed.

Throughout the entire process from begining to end all Mr. Stanford did was lie. I the Plaintiff in this case paid Mr. Stanford \$25,000 twenty five thousand dollars to effectively represent the Plaintiff.

Mr. Stanford failed to live up to his sixth amendment obligation.

If not for the inducements by Daniel Stanford the Plaintiff in this case would have gone to trial and recieved less time under an unconstitutional guideline whether mandatory or advisory it's all still unconstitutional.

Counsel Daniel Stanford's actions caused grievous harm and truly harmed the Plaintiff.

All of counsels actions raise Constitutional questions, violations of the Plaintiffs Constitutional rights. Daniel Stanford also failed to pay \$300.00 dollar special assessment after my family sent him the money.

IV. Remedy (monetary Damages) in the amount of;

\$500,000.00 Five Hundred Thousand Dollars.

Respectfully Submitted

[Signature]



Ramon A. Paniagua

Certificate of Service

I Ramon A. Paniagua do hereby certify that Complaint against Daniel Stanford was sent to the clerks office upon the address of U.S. District Court Western District of Louisiana, 800 Lafayette St. Suite 2100, Lafayette, Louisiana 70501 also a copy of Complaint was sent to Daniel Stanford upon his address of 117 Caillouet Place, Lafayette, LA 70501 by U.S. first class mail this 3rd day of August 2006.

[Signature]



Ramon A. Paniagua

Monroe, Louisiana
Page 15033-019
Federal Corrections Institution

P.O. Box 338

West Hill NJ 08840

Legal Mail

Clerks Office

U.S. District Court

Western District of Louisiana
800 Lafayette St. Suite 2100

Lafayette, Louisiana 70501
70501-0005 CO044

U.S. District Court
Western District of Louisiana
800 Lafayette St. Suite 2100
Lafayette, Louisiana 70501

